

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

SCOTT ALLISON,

Defendant

) Criminal No. 21cr10357

) Violations:

) Count One: Advertisement of Child
) Pornography

) (18 U.S.C. §§ 2251(d)(1)(A) and (e))

) Forfeiture Allegation:
) (18 U.S.C. § 2253)

INDICTMENT

COUNT ONE

Advertisement of Child Pornography
(18 U.S.C. §§ 2251(d)(1)(A) and (e))

The Grand Jury charges:

On or about April 13, 2021, in the District of Massachusetts, and elsewhere, the defendant,

SCOTT ALLISON,

knowingly made, printed, and published a notice and advertisement offering to exchange, display, distribute, and reproduce a visual depiction, the production of which involved the use of a minor engaging in sexually explicit conduct and which depiction was of such conduct, knowing and having reason to know that such notice and advertisement would be transported using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including computer, and such notice and advertisement was transported using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(d)(1)(A) and (e).

CHILD PORNOGRAPHY FORFEITURE ALLEGATION
(18 U.S.C. § 2253)

The Grand Jury further finds:

1. Upon conviction of Title 18, United States Code, Section 2251(d) set forth in Count One, the defendant,

SCOTT ALLISON,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, (i) any visual depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

- a. One Western Digital My Passport external hard drive with serial number WX81E662UFLY; and
- b. One Western Digital 1.0 TB hard drive, model: WD10EZEX.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant—

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States of America, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL


FOREPERSON


J. MACKENZIE DUANE
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: DECEMBER 19, 2021
Returned into the District Court by the Grand Jurors and filed.

/s/ Leonardo T. Vieira signed at 2:10pm
DEPUTY CLERK